Claim 6 has been modified to clarify the distinction between what the applicants regard as a file manager (i.e., an apparatus for managing a directory structure as imposed by an OS file system) and a document manager (i.e., an apparatus for managing a grouping of files distinct from any OS file system directory structure). Support for these changes can be found in the Specification at least at page 3, lines 29-33 and page 11 lines 12-14.
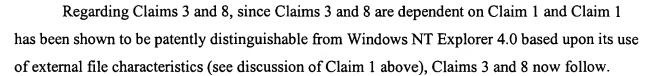
Claims 1-17 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Windows NT Explorer 4.0 screen dumps (Figs. 1-7). The rejection is respectfully traversed. Applicants respectfully request that the rejection be withdrawn for the following reasons.

Regarding independent Claims 1 and 7, the Examiner states that Windows Explorer NT discloses a "display assembly...for displaying the indication of file characteristics...in a manner free of opening an application program in working memory... (preview of file in Fig.3)".

Windows NT Explorer 4.0 screen dumps disclose an operating system extension to display a list of files, including **external** file characteristics (e.g., name, size, type, modified date). Windows NT Explorer 4.0 allows for the selection of files and displays the contents of the selected files (i.e., QuickView, Fig. 2) without opening and running the application program that created the files. The present invention provides a method and apparatus for previewing image files and **internal** file characteristics (e.g., image height, width, length, color type, resolution, compression type) without opening and running the application program that created the files. Windows NT Explorer 4.0 relies upon the OS (e.g., NT) file system to provide an interface to access external file characteristics, whereas the present invention uses its own process (i.e., image engine 25) to obtain internal file characteristics.

Regarding independent Claim 12, the Examiner states that Windows NT Explorer 4.0 discloses a method "...for enabling display of file characteristics...". The present invention is "...enabling display of **internal** file characteristics...", not external file characteristics as Windows NT Explorer 4.0 provides. This distinction makes Claim 12 patently distinguishable from Windows NT Explorer 4.0.

Regarding Claim 2, Claim 2 is dependent on base Claim 1. Claim 1 has been shown above to be patently distinguishable from Windows NT Explorer 4.0 based upon its use of external file characteristics (see discussion of Claim 1 above). Claim 2 by virtue of its dependency from Claim 1, includes the limitation and hence patentable distinctions of Claim 1, and thus follows.

Regarding Claims 3 and 8, since Claims 3 and 8 are dependent on Claim 1 and Claim 1 has been shown to be patently distinguishable from Windows NT Explorer 4.0 based upon its use of external file characteristics (see discussion of Claim 1 above), Claims 3 and 8 now follow.

Regarding Claim 13, "...displaying a working image with the indications of file characteristics of said file.", here again the claim has been amended to further clarify that the present invention uses indications of **internal** file characteristics.

Regarding Claims 4, 9 and 14, each of these claims is dependent on a respective base claim (Claims 1, 7, 12) that has been amended to further clarify that the present invention uses indications of **internal** file characteristics. Because these claims are dependent on a base claim that is now amended to be patently distinguishable from Windows NT Explorer 4.0, they now follow.

Regarding Claims 5, 10 and 15, the Examiner states that Windows NT Explorer 4.0 discloses "method and apparatus to provide the indication of file characteristics (the compression **type** in Fig. 7)". Fig. 7 shows a Compression attribute (i.e., whether or not compression is on or off), not a compression type (e.g., Huffman, LZW, PKZIP, etc...). None of the specific internal file characteristics stated (i.e., height, width, length, color type, resolution, compression type) in Claims 5, 10 and 15 are found in Windows NT Explorer 4.0. Thus the cited reference and none of the prior art imply or suggest or make obvious the present invention method and apparatus for previewing files. Therefore Claims 5, 10 and 15 are patently distinguishable from Windows NT Explorer 4.0.

Regarding Claims 6 and 1, the Examiner states that Windows NT Explorer 4.0 discloses that "the file manager is a document manager for managing directories of files (Fig. 5). As amended Claim 6 now more clearly describes the document manager. Both Claims 6 and 11 describe a document manager supporting a grouping of files distinct from an OS file system directory structure. Such is patently distinguishable from the file manager of Windows NT Explorer 4.0.

Regarding Claim 16, the Examiner states that Windows NT Explorer 4.0 discloses "a method...providing display assembly...displaying indications of file characteristics outside of an application program...(Fig. 7)". Claim 16 has now been amended to further clarify that the

present invention uses indications of **internal** file characteristics, and thus is patently distinguishable from Windows NT Explorer 4.0.

Regarding Claim 17, as described in the discussion of Claims 6 and 11 above, applicants' document manager is not implied or suggested by the file manager of Windows NT Explorer 4.0 and thus Claim 17 is patently distinguishable from Windows NT Explorer 4.0.

Accordingly, the present invention file previewer providing display of internal file characteristics as now claimed by Claims 1-17 is not implied or suggested by the prior art and is thus patentable over the art.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims (Claims 1-17) are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned at (781) 861-6240.

Respectfully submitted,

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